

# Lead Partnership Group

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Via electronic transmission

NEPA Task Force

P.O. Box 221150

Salt Lake City, UT 84122 submitted as e-mail through CEQ website

RE: July 9, 2002, Federal Register Notice and Request for Comments

Dear Task Force Members:

We are citizens of forest communities in southern Oregon and northern California. We are also members of local collaborative efforts aimed at resolving the political and bureaucratic gridlock that has surrounded federal forest management for the past twelve years in the western United States. For nearly that amount of time, representatives of our individual groups have also been meeting nine to ten times each year as the "Lead Partnership Group" to share information and to attempt to solve problems encountered by our individual local partnership efforts.

While we are members of these groups, those of us signing on to this letter do so as individuals because we have not had time to obtain approval to speak for our groups as a whole.

Our organizations range from relatively high-profile groups such as the Applegate Partnership and Quincy Library Group to smaller watershed councils and non-timber resource cooperatives and learning centers. One of the things all of our groups have in common is that we are rural communities affected by U.S. Forest Service and Bureau of Land Management forest management policies and practices. We have all had extensive experience in Forest Service public involvement and NEPA processes for the Northwest Forest Plan, the Sierra Nevada Framework and Forest Plan Amendment EIS, and/or the Herger-Feinstein QLG Forest Recovery Act EIS, in addition to numerous project-level NEPA processes.

Your July 9 Federal Register notice stated that the purpose of the NEPA Task Force is "to seek ways to improve and modernize NEPA analyses and documentation and to foster improved coordination among all levels of government and the public." Comments on the proposed nature and scope of the NEPA Task Force were invited. The list of questions about information sources and technologies used in NEPA analyses that is posed in the Federal Register notice, however, seems wholly unrelated to the problems with present-day implementation of NEPA by the USFS and BLM. The task force's focus on information technology and governmental agency interrelationships seems off the mark, since these are not the sources of NEPA process failures.

The "NEPA inefficiencies" we encounter are those due to lack of current and accurate resource data; not adhering to procedural requirements for planning and responding to public input; and a plain and simple failure to analyze and disclose relevant environmental, economic, and social factors in project decision-making. These in turn lead to decisions that disenchant one or more set of citizens, who then formally object and/or challenge the decisions in court. This leads to what we suppose the Task Force refers to as "inefficiencies" when their NEPA and planning records are found to be insufficient support for the decisions.

While certainly other kinds of NEPA reviews might be conducted—and we believe they are essential—we do not have objections to the task force's review of information technology and governmental agency interrelationships in the context of NEPA. We feel the NEPA Task Force's scope is too narrow and that there are more significant problems with the effective implementation of NEPA than 'information technology and government agencies interrelationships.' We request that you make clear what issues the task force is and is not reviewing and what recommendations will follow from your review. We request also that the task force recommendations closely comport with the scope of the review delineated in the Federal Register notice. Should the Task Force's review or comments go beyond the scope of the July 9, 2002 Federal Register notice, we urge an open and public process, additional public comment and review.

We thank you for your attention to these comments.

Sincerely,

Jonathan Kusel  
Facilitator, Lead Partnership Group

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Pacific West Community Forestry Center

Linda Blum  
Quincy Library Group

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